



WESTON W. REEVES
wwr@parkstreetlaw.com

Katherine Genoff, legal assistant

ANNA REEVES OLSON*
aro@parkstreetlaw.com

*also admitted in Colorado

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Via email: nancy_freudenthal@wyd.uscourts.gov

Judge Nancy Freudenthal
Judge of the District Court
2120 Capitol Avenue, Room 2242
Cheyenne, WY 82001-3633

Re: *Biles v. Schneider*
U.S.D.C., District of Wyoming, No. 11-CV-366F

Dear Judge Freudenthal:

I have learned that you may be conducting, a hearing on whether to seal certain exhibits, transcripts or evidence in this case.

I represent Jim and Martie Clark who have an interest in this subject. While the Clarks had a medical negligence case pending against Dr. Schneider in the Medical Review Panel, he sued them for defamation, intentional interference with business opportunities, and intentional infliction of emotional distress. That case is known as *Schneider v. Clark*, Fifth Judicial District, Park County, Civil No. 26753. He has just now signed interrogatories claiming damages in loss of net patient revenues of \$7.25M. Obviously, if there are other reasons for Dr. Schneider's loss of income, it is critically relevant to our case.

Obtaining discovery from Dr. Schneider has been very difficult, although we do now have received a copy of the flashdrive from other parties.

I request that you permit us to enter an amicus appearance and participate in any hearing on the subject of sealing any information in the case, and to move the Court for access to material covered by protective orders. Whether material of the type involved here, concerning a licensed physician,

The Hon. Nancy Freudenthal
May 10, 2012
Page 2

should be under seal is a matter of significant public interest. The court has broad discretionary authority to permit participation of parties as amicus curiae. *Bryant v. Better Business Bureau of Greater Maryland, Inc.*, 923 F.Supp. 220 (D. Md. 1996).

The parties are apparently releasing information about the case. See:

http://www.codyenterprise.com/news/local/article_7d1d5c20-988b-11e1-b326-001a4bcf887a.html

<http://www.powelltribune.com/news/item/9353-dr-schneider-fires-back>

Depositions and interrogatories which are under seal or protective order most certainly contain material relevant to Dr. Schneider's claims against our clients. We request the Court to release such information to us, subject to the existing protective order.

Yours very truly,

W.W. Reeves

WWR/kg

ec: Mary Kristeen Hand, hand@spencelawyers.com
Daniel Fleck, fleck@spencelawyers.com
Bradley D. Bonner, brad@bonnerstinsonpc.net
Laurence William Stinson, laurence@bonnerstinsonpc.net
P. Craig Silva, csilva@wpdn.net